

Colorado Department of Health
Comments on Technical Memorandum 1, OU9
Volume I, Part A - Outside Tanks

General Comments

1) The Division cannot accept indefinite deferral of the investigation and closure of some of the OU9 tanks. The Field Sampling Plan of the approved OU9 Workplan contends:

"Tanks and pipelines which are active waste management units are not included in the scope of this Work Plan because their structures and associated soils will be addressed at the time of their closure in accordance with the RCRA Part B Permit Applications for the Rocky Flats Plant."

The above statement ONLY applies to tanks that are either permitted or have interim status under RCRA. None of the OU9 tanks are in the operating permit, and the Division records show only the following tanks to have interim status:

| <u>RCRA Units</u> | <u>OU9 Tank System</u> |
|-------------------|---------------------------------|
| 40.04, 40.05 | T-5, Bldg. 444 |
| 40.20 - 40.26 | T-24, Bldg. 881 (887 Waste Pit) |
| 40.30, 40.31 | T-25, Bldg. 883 |
| 40.39 - 40.41 | T-26, Bldg. 883 |

These interim status tanks must be closed under §265, Subpart G, of the Colorado Hazardous Waste Act (CHWA). These are the only tanks to which the above reference applies.

The remainder, and majority, of the OU9 tanks must be investigated as potential contamination sources under the authority of the IAG. Spill control, plenum deluge, and secondary containment tanks are not truly "active" in the sense that they are not regularly in use (they are emergency backup systems), and there is no reason why nonintrusive investigation of these tanks and associated structures cannot take place. As long as these tanks present potential risks from either residual materials or contaminated soils/structures from known past releases, the Division will not allow postponement of their investigation and closure. This is a larger issue and will pertain to all OU9 tanks. The Division has brought this issue to DOE's attention in the past and has received no response. Depending on the specific situation, the sampling may not preclude the tank from continuing to perform its existing mission.

The implications to this Technical Memorandum are that the following Outside Tanks cannot be deferred as proposed and must be investigated within the scope of its activities:

- T-8 (2 25,000 gallon underground concrete tanks in waste pit 728; listed as plenum deluge)
- T-9 (2 22,500 gallon underground concrete tanks in waste pit 730; listed as plenum deluge)
- T-11, T-30 (2 2,000 gallon sumps inside waste pit 731; listed as secondary containment)

2) Section 7.3.2 of the original Workplan goes on to say that OPWL pipeline valve vaults will be investigated in the same manner as tank secondary containment structures (waste pits) during the OPWL tank investigation. DOE must provide a sound rationale for why the valve vaults are not included in this TM's scope of work. Without an acceptable justification, including when the valve vaults would be investigated, they will have to be included under this TM.

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3) There is no schedule for the implementation of the work. At the very least, we need to have a start date commitment and an estimate of the duration for this work. It would also be helpful to know when we can expect to see Part B and Volume II of this TM. DOE was supposed to have completed the entire RFI/RI (3 stages) at this time; it is not enough to know that the remainder of Stage 1 sampling activities will occur "at a later date."

Specific Comments

1) Table 1-2: CDH's Air Pollution Control Division has supplied air emission inventory numbers for the following tanks: T-9 is 00300, T-10 is 00302, and T-16 is 00182/00183. Also, the APCD has the volume of T-29 at 121,000 gallons.

2) Section 3.1.1: Using a tripod-mounted HPGe configuration on 25' centers may not make sense. As an example, Figure 3-1 (sample locations for T-1) shows 9 HPGe survey locations, several of which are about 40' away from the actual tank location. What will these outer survey locations tell us? It seems more practical to focus the radiation survey around the immediate tank area. If the higher sensitivity HPGe is incapable of delineating specific radioactivity anomalies on a tank-sized grid, it may be more appropriate to go in with just the NaI detector. It is also stated that the NaI detector will be used for a prework survey of the borehole locations for all tank locations. There appears to be little value added to using the HPGe on a coarse grid if the NaI will be used anyway.

3) Section 3.1.3: "Residue samples are to be taken from each abandoned tank that has not been cleaned since its removal from process waste service." However, Appendix D says no samples will be collected from T-2 and T-3. Residue or wipe samples must be taken from ALL tanks - access inconvenience is not an acceptable excuse. It will be impossible to make a dispositional decision without knowing what is in the tanks.

4) Section 3.1.4: "Sampling of incidental waters will be conducted to characterize potential contamination of valve vaults." Is this a typo, or are the valve vaults (as opposed to the tank waste pits) going to be investigated?

5) Section 3.1.7: Groundwater sampling with the HydroPunch in soil boreholes must be timed to coincide with high water conditions. DOE has the opportunity to do this right in the next two months. Mobilization of this technique in September won't be highly effective.

6) Section 3.2.2: Some attempt must be made to characterize the underground tanks (see specific comment #3). It is also unclear that the six RFP composite soil samples will provide information that the five grab samples will not.

7) Appendix A: Some minor disorganization. Pages A-12 and A-13 discuss tanks T-15 and T-17 but are labeled as T-29 on the title line. There are no pages for T-29.